

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

**Re: D.I. 298**

**CERTIFICATION OF COUNSEL REGARDING FLAGSTAR BANK, FSB'S MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d)**

Flagstar Bank, FSB (“Flagstar”), by and through the undersigned counsel, hereby certifies as follows:

1. On August 5, 2022, Flagstar filed *Flagstar Bank, FSB's Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)* [D.I. 298] (the “Motion”) and a motion to shorten the notice period thereto [D.I. 300]. Pursuant to the *Order Shortening the Notice and Objection Periods with respect to Flagstar Bank, FSB's Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) to Foreclose on Mortgage Loans and Related Cash Collateral* [D.I. 302], the deadline to object to the Motion was August 9, 2022, at 12:00 p.m. (ET) (the “Objection Deadline”). The Objection Deadline was extended to August 10, 2022, at 5:00 p.m. (ET) for the Debtors.

2. Prior to the Objection Deadline, Federal Home Loan Mortgage Corporation filed a limited objection and reservation of rights [D.I. 306]. Flagstar also received informal comments from the Debtors. Flagstar received no other objection or informal

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors' mailing address is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

comments to the Motion, and no other objection or other responsive pleading to the Motion appears on the Court's docket.

3. The revised proposed order (the "Revised Proposed Order"), attached hereto as Exhibit A, resolves the Debtors' informal comments. The Debtors have reviewed the Revised Proposed Order and do not object to its entry.

4. In response to its limited objection and reservation of rights, Flagstar provided Federal Home Loan Mortgage Corporation with certain information relating to Flagstar's pledged mortgage loans. Federal Home Loan Mortgage Corporation has not made any further requests for information.

5. For the convenience of the Court and all parties in interest, a redline of the Revised Proposed Order against the proposed order filed with the Motion is attached hereto as Exhibit B.

WHEREFORE, Flagstar respectfully requests that the Court enter the Revised Proposed Order at its earliest convenience.

*[Remainder of Page Left Intentionally Blank]*

Dated: August 11, 2022  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

/s/ Tori L. Remington

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